



MARIN COUNTY FARM BUREAU
P.O. Box 219, Pt. Reyes, CA 94956

November 14, 2011

OWTS Policy
State Water Resources Control Board
P.O. Box 2231
Sacramento, CA 95812
Owts_commentletters@waterboards.ca.gov

Subject: Comments on the Proposed OWTS Policy

State Water Resources Control Board:

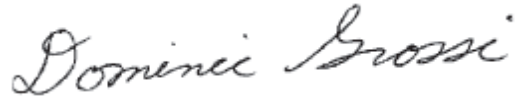
Thank you for providing the opportunity to submit comments on the proposed *Policy for Siting, Design, Operation and Management of Onsite Wastewater Treatment Systems (OWTS)*. We have reviewed the *Policy* and thank your Board and staff for the significant effort to abandon the 2008 policy and start anew. The prescriptive standards in the 2008 policy could not have worked in California with the varied geology and geography of the state. However as the *Policy* is written in general terms, we have some concerns about the implementation of the *Policy* by Regional Water Quality Control Board (RWQCB) staff. The specific concerns are:

Sec.10.0 authorizes local agencies to implement Advanced Protection Management Programs without requiring them to enforce it upon existing OWTS. Yet, Sec. 10.2 requires existing OWTS to comply with certain enhanced requirements. Another minor example is Table 1 of Tier 1. Tier 1, as I understand, can exist where there is no Tier 2 local program. But, Table 1 shows as the minimum depth to groundwater for the two extreme percolation rates, "only as authorized in a Tier 2 program."

Sec.9.3.8 The monitoring and assessment of groundwater and local surface water quality on a regional and localized basis across the entire jurisdictional area. At a minimum, testing for nitrates and pathogens would be required though existing data could be used. The type of monitoring and the frequency requirement is unclear. This will add significant administrative expenses to either the local agency in terms of sample collection, data collection and tracking, etc or the expenses passed on to the property owners. We have serious concerns about these costs to the property owners as well as for the OWTS upgrades including advanced wastewater treatment components, the costs for surface water and groundwater monitoring, and operating permit fees. The idea of increased costs for OWTS in the current economic climate is not palatable for property owners.

We suggest that State Water Resources Control Board direct the RWQCBs to start meeting with local agencies to discuss how they will implement the policy. This would help the local agencies understand what will be required and so they can plan program changes.

Thank you for your considerations,

A handwritten signature in cursive script that reads "Dominic Grossi".

Dominic Grossi
President,
Marin County Farm Bureau